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February 22, 2002

APPLICATION

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Honorable Felix J. Boudreaux
Commissioner of Conservation
P.O., Box 94275
Baton Rouge, LA 70804-9275

RE: 13800' Zone, Reservoir B
Rousseau Field
Lafourche Parish, Louisiana

Dear Commissioner Asprodites:

Application is hereby made on behalf of **POGO PRODUCING COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters related to the **13,800' Zone, Reservoir B**, in the Rousseau Field, Lafourche Parish, Louisiana, to-wit:

1. To establish rules and regulations and create a single drilling and production unit for the exploration for and production of gas and condensate, such unit to be designated the 13800 RB SUA;
2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;
3. To designate the Pogo Producing Co.-K. O. Realty, L.L.C., et al No. 1 Well as the unit well for the proposed unit;

4. To designate Pogo Producing Company as the unit operator for the proposed unit;
5. To provide that any future wells drilled to the 13800' Zone, Reservoir B, should be located in accordance with the spacing provisions of Statewide Order No. 29-E;
6. To provide that the Commissioner of Conservation should be authorized to reclassify the 13800' Zone, Reservoir B, by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir change and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation; and
7. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The 13,800' Zone in the Rousseau Field, Lafourche Parish, Louisiana was previously defined by Order No. 343-CC, effective July 17, 2001, and is hereby further defined as that certain gas and condensate bearing zone encountered between the depths of 14,542 feet and 15,532 feet, electrical log measurements (14,280 feet and 15,046 feet, TVD), in the Pogo Producing Co.-K.O. Realty, L.L.C., et al No. 1 Well, located in Section 63, Township 15 South, Range 17 East, Lafourche Parish, Louisiana.

A conference to discuss the proposed application and any opposition thereto was held 10:00 a.m., on Friday, February 15, 2002, at The Howard Johnsons, 201 North Canal Blvd., Thibodaux, LA 70301 (985-447-0971). A list of the parties who attended the pre-application conference is attached. Randall C. Songy, attorney for the applicant, opened the conference with a brief discussion of the Rules of Procedures. David Comeaux, geological consultant for the applicant, explained the applicant's proposal and the geological, engineering and other bases therefor, and answered questions. There were no counter plans presented. The conference was then adjourned.

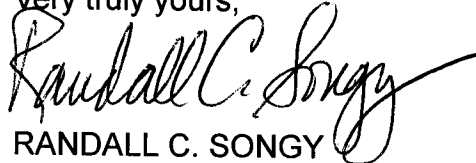
Pertinent data relating to the proposed application can be obtained, AT THE COST OF THE REQUESTING PARTY, by contacting David Comeaux at Leon E. Comeaux & Associates, 305 La Rue France, Lafayette, LA 70508 (337) 233-9839.

There is attached hereto and made a part hereof a plat outlining the proposed unit and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished ONLY to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be

provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, enclosed herein is our check in the amount of \$700.00 made payable to the Office of Conservation in payment of the required hearing application fee.

Very truly yours,



RANDALL C. SONGY

RCS/dde/bad

Enclosures

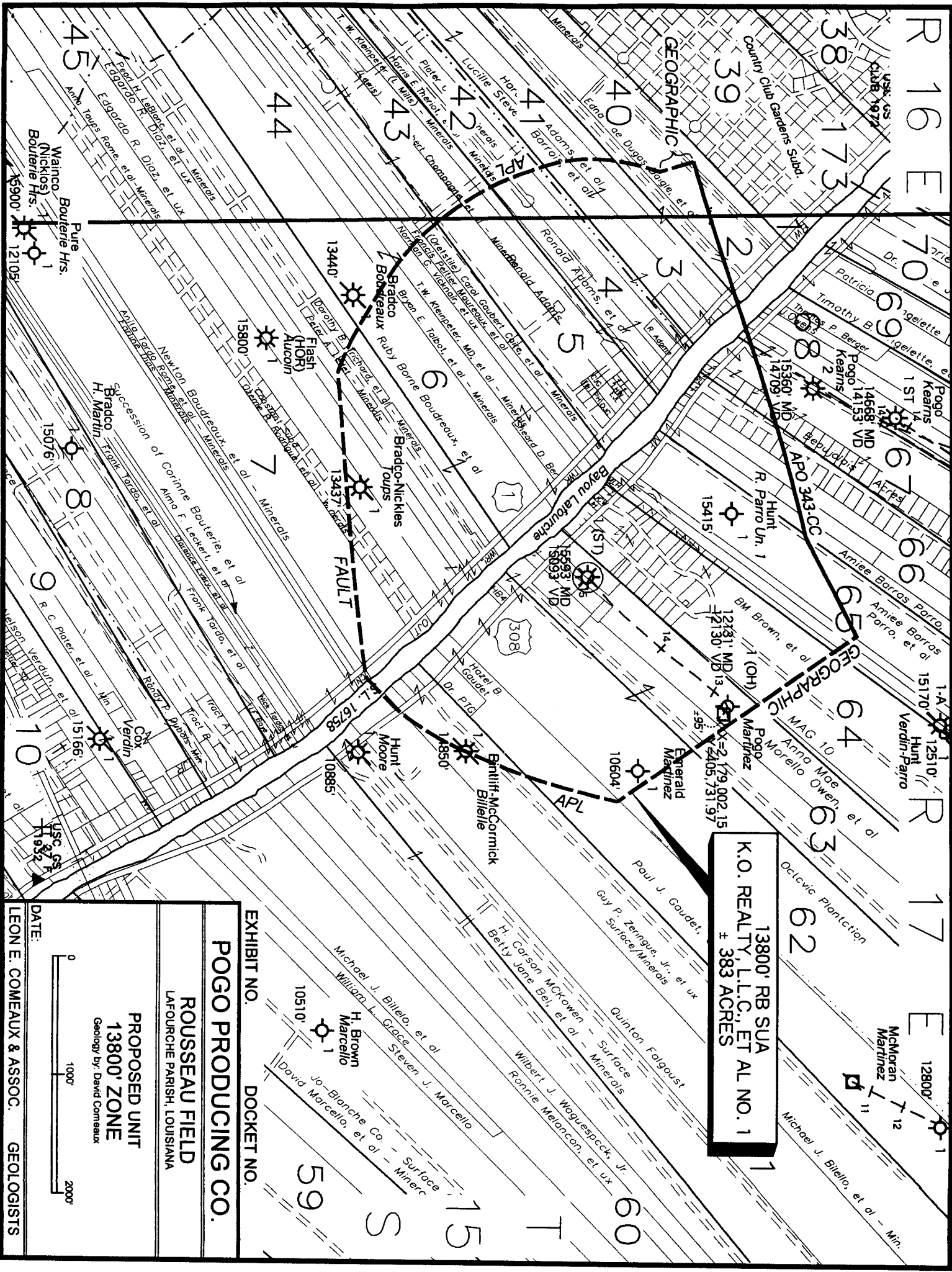
cc: Mr. Richard Hudson, District Manager
Office of Conservation

All Interested Owners, Interested Parties
and Represented Parties

P.S. To all Interested Owners, Represented Parties and Interested Parties:

You may have received this Application even though your property is not included in the proposed unit, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed units. In some cases, the area proximate to proposed units can extend as far as one-half mile outside the unit boundary.

Your receipt of this Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.



13800' RB SUA
K.O. REALTY L.L.C., ET AL NO. 1
± 383 ACRES

EXHIBIT NO. DOCKET NO.

POGO PRODUCING CO.

ROUSSEAU FIELD
LAFOURCHE PARISH, LOUISIANA

PROPOSED UNIT
13800' ZONE
Geology by: David Comeaux

DATE:

LEONE E. COMEAUX & ASSOC. GEOLOGISTS

